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March 1, 2011

Via Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby – TW-A325
Washington, D.C. 20554

**Re: AT&T Annual CPNI Compliance Certifications Calendar Year 2010
EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2009(e), AT&T, on behalf of the attached list of operating entities, hereby submits its annual CPNI compliance certifications for calendar year 2010 via the Commission's Electronic Comment Filing System. AT&T also provides one (1) copy to Best Copy and Printing via email.

Should you have any questions, feel free to contact me.

Sincerely,

/s/ Anisa A. Latif
Anisa A. Latif

Attachment

2010 CPNI Certification
Marketing, AT&T Mobility and Consumer Markets

Date: 28 January 2011

1. I, David Christopher, Chief Marketing Officer for AT&T Mobility and Consumer Markets, ("Responsible Business Unit") hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2009, the Responsible Business Unit for which I am accountable has established safeguards and operating procedures designed to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: 

David Christopher, Chief Marketing Officer, AT&T Mobility and Consumer Markets

EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2010:
DAVID CHRISTOPHER, CHIEF MARKETING OFFICER—AT&T CONSUMER AND
MOBILITY MARKETS

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the Consumer and Mobility Markets Marketing Organization (“My Organization”) ensure compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC’s rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in My Organization, or (ii) developed by other organizations, in which case My Organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures.

A. Customer CPNI Approvals. To the extent applicable, My Organization has:

- 1.** Established processes and controls preventing the use of, disclosure of, or access to CPNI to market “out of category” services without customer approval or unless such use, disclosure, or access is permitted under FCC rules. Those processes and controls include the review of list pulls and outbound marketing campaigns to ensure that CPNI rules are followed before the campaigns are launched. Further, the personnel who review the list pulls and outbound marketing campaigns are apprised that any approval or disapproval by a customer of the use, disclosure, or access to the customer’s CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. § 64.2005(a) and (b) and § 64.2007(a)(2). Specifically, these processes and controls ensure that no use, disclosure, or access to a customer’s individually identifiable CPNI occurs except where: (1) the customer granted “opt in approval” as defined in 47 C.F.R. § 64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. § 2005; or (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. § 64.2007(b).
- 2.** Established processes and controls whereby, prior to any solicitation for customer approval to use, disclose, or permit access to the customer’s CPNI, the customer is

notified of the customer's right to restrict use, disclosure, and access to CPNI. See 47 C.F.R. § 64.2008(a)(1). These processes and controls include the review and approval of any change in content or distribution method for initial CPNI Rights Notifications and Biennial CPNI Rights Notifications. Further, specific job functions have been established within My Organization to manage CPNI, including the development of new processes to comply with any CPNI rule modifications by the FCC. See 47 C.F.R. § 64.2008(a)-(d).

3. Established processes and controls to ensure that toll-free numbers with IVR and voice mail features permitting customers to "opt out" are available 24 hours a day, seven days a week. Those processes and controls include test calls to the toll-free numbers several times a week and robust reporting of opt-out activity that is reviewed on a daily and weekly basis. See 47 C.F.R. § 64.2008(d)(3)(v).

4. Established processes and controls to ensure AT&T agents comply with the FCC's CPNI rules. These processes and controls include an annual notice sent to vendor agents involved in marketing and/or fulfillment of CPNI Rights Notifications reminding them of their obligations to ensure the confidentiality and proper use of all such information. See 47 C.F.R. § 64.2007(b).

B. Training and Discipline: My Organization:

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, My Organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods, such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner, and all AT&T employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. § 64.2009(b).

2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to

removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. § 64.2009(b).

C. Sales and Marketing Campaigns. My Organization:

1. Maintains a record, for at least one year, of all approved marketing campaigns, including a description of the campaign, the type of CPNI used, and the products and services offered. See 47 C.F.R. § 64.2009(c).
2. Has established a supervisory review process for all outbound marketing campaigns to ensure all sales and marketing campaigns that propose to use CPNI are reviewed and approved. All proposed outbound marketing campaigns, requests for use of CPNI, and requests for marketing lists and customer data are submitted for review and require supervisory approval by the Customer Lifecycle Marketing group or the Database Marketing group. (During 2010, the Customer Lifecycle Marketing group, which previously had reviewed campaigns directed toward wireless-only customers, began transitioning to include campaigns directed toward wireline-only and joint wireless/wireline customers, which previously had been reviewed by the Database Marketing group.) See 47 C.F.R. § 64.2009(d).

D. Security and Authentication. My Organization has:

1. Established processes and controls to notify the customer via U.S. mail when a password, back-up means of authentication for lost or forgotten passwords, an online account, or an address of record is created or changed and to ensure that the content and delivery of such notice is in accordance with 47 C.F.R. § 64.2010(f). See also 47 C.F.R. § 64.2003(b). Specifically, My Organization reacts to triggers from IT systems that notification must be sent via U.S. mail (for all segments except Online and Mobility transactions). My Organization manages the content and postal delivery of such notifications and validates by reviewing customer counts, notification types, and postal receipts from the fulfillment vendor. (Other organizations manage notifications by means other than U.S. mail).
2. Established processes and controls to ensure that customer-initiated CPNI complaints or breaches, as "breach" is defined in 47 C.F.R. § 64.2011(e), are reported to

AT&T Asset Protection for investigation and resolution and for complaint tracking and breach reporting purposes. See 47 C.F.R. § 64.2011. My Organization also, at the direction of Regulatory Compliance and Asset Protection, manages the fulfillment of customer breach notifications by mail when such notifications are required.

Attachment 2

**AT&T Inc. CPNI Certification
Calendar Year 2010**

Date: Feb. 3 2010

1. I, Cathy Martine-Dolecki, EVP Small Business Solutions and Alternate Channels ("Responsible Business Unit") hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2010, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: Cathy A. Martine-Dolecki

Attachment 2

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2010
OF Cathy Martine-Dolecki, Executive Vice President - Small Business
Solutions and Alternate Channels**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the Small Business Solutions and Alternate Channels (my organization) ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures.

A.. Customer CPNI Approvals. To the extent applicable my organization has:

1. Established and distributed methods and procedures (M&Ps) whereby personnel were not to disclose or permit access to customer's CPNI for "out of category" services without customer approval or unless such disclosure or access was permitted under FCC rules and personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the

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customer's CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).

2. Established and distributed M&Ps whereby personnel were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).

3. Established and distributed M&Ps whereby personnel were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the customer granted "opt in approval" as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).

4. Established and distributed M&Ps whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, to notify the customer of the customer's right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, established and distributed M&Ps whereby personnel were required to make a record of customer's consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).

5. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer's right to restrict the use of, disclosure of, and access to that customer's CPNI. 47 C.F.R. §64.2008(b) and (c).

6. Maintained an IVR and toll free number with voice mail whereby customers, at no additional cost, could avail themselves of an "opt-out" method. The IVR and voice mail were available 24 hours a day, seven days a week. See 47 C.F.R. §64.2008(d)(3)(v).

7. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for limited, one time use of a customer's

Attachment 2

CPNI for duration of the call, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).

8. Established M&Ps or implemented systems to clearly establish the status of a customer's CPNI approval prior to the use of CPNI. See 47 C.F.R. §64.2009(a).

B. Training and Discipline: My organization:

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, my organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner and all AT&T employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009 (b).

2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

C. CPNI Complaints and Breaches: To the extent applicable my organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

Attachment 2

D. Security and Authentication. To the extent applicable my organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. § 64.2010(a).
2. Established methods and procedures prohibiting the disclosure of call detail over the phone unless the customer provides a password established in a manner consistent with 47 C.F.R. § 64.2010(e)
3. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. § 64.2010 (c) and (e).
4. Established procedures that notify customers immediately when there has been a change to the account as contemplated by 47 C.F.R. §64.2010 (f).

AT&T Inc. CPNI Certification
Calendar Year 2010

Date: January 19, 2011

1. I, Michael T. Felix, President AT&T Alaska (Alascom) hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2010, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: Michael T. Felix

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2010
OF MIKE FELIX, PRESIDENT AT&T ALASKA (ALASCOM)**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the Alascom Business Unit (my organization) ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures.

A. Customer CPNI Approvals. To the extent applicable my organization has adopted operating procedures & followed corporate policy with regards to:

1. Methods and Procedures (M&Ps) whereby personnel were not to disclose or permit access to customer's CPNI for "out of category" services without customer approval or unless such disclosure or access was permitted under FCC rules and personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer's CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).
2. M&Ps whereby personnel were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).

3. M&Ps whereby personnel were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the customer granted "opt in approval" as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).

4. M&Ps whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, to notify the customer of the customer's right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, follow M&Ps whereby personnel were required to make a record of customer's consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).

5. M&Ps or scripts whereby personnel were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer's right to restrict the use of, disclosure of, and access to that customer's CPNI. 47 C.F.R. §64.2008(b) and (c).

6. Maintaining an IVR and toll free number with voice mail whereby customers, at no additional cost, could avail themselves of an "opt-out" method. The IVR and voice mail were available 24 hours a day, seven days a week. See 47 C.F.R. §64.2008(d)(3)(v).

7. M&Ps or scripts whereby personnel were required, prior to any oral solicitation for limited, one time use of a customer's CPNI for duration of the call, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).

8. M&Ps or implemented systems to clearly establish the status of a customer's CPNI approval prior to the use of CPNI. See 47 C.F.R. §64.2009(a).

B. Training and Discipline: My organization: Alascom

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, my organization periodically provides such personnel information on

CPNI and other privacy related issues through less formal education methods such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner and all AT&T employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009 (b).

2. AT&T Alaska maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

C. CPNI Complaints and Breaches: To the extent applicable my organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

D. Security and Authentication. To the extent applicable my organization has adopted operating procedures & followed corporate policy with regards to:

1. Account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. § 64.2010(a).
2. Methods and procedures prohibiting the disclosure of call detail over the phone unless the customer provides a password established in a manner consistent with 47 C.F.R. § 64.2010(e)
3. Procedures for online access to CPNI in a manner consistent with 47 C.F.R. § 64.2010 (c) and (e).
4. Procedures that notify customers immediately when there has been a change to the account as contemplated by 47 C.F.R. §64.2010 (f).

**AT&T Inc. CPNI Certification
Calendar Year 2010**

Date: 1/23/11

1. I, Andy Geisse, Executive Vice President of ABS Global Customer Service, hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.
2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2010, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").
3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: Andy M Geisse

EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2010
Of Andy Geisse, Executive Vice President of ABS Global Customer Service

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by ABS Global Customer Service ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures.

A. Customer CPNI Approvals. To the extent applicable my organization has:

1. Established and distributed methods and procedures (M&Ps) whereby personnel were not to disclose or permit access to customer's CPNI for "out of category" services without customer approval or unless such disclosure or access was permitted under FCC rules and personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer's CPNI must remain in effect until revocation or limitation of such

approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).

2. Established and distributed M&Ps whereby personnel were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).

3. Established and distributed M&Ps whereby personnel were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the customer granted "opt in approval" as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).

4. Established and distributed M&Ps whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, to notify the customer of the customer's right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, established and distributed M&Ps whereby personnel were required to make a record of customer's consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).

5. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer's right to restrict the use of, disclosure of, and access to that customer's CPNI. 47 C.F.R. §64.2008(b) and (c).

6. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for limited, one time use of a customer's CPNI for duration of the call, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).

B. Training and Discipline: My organization:

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, my organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner and all AT&T employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009 (b).

2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

C. CPNI Complaints and Breaches: To the extent applicable my organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

D. Security and Authentication. To the extent applicable my organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. § 64.2010(a).

2. Established methods and procedures prohibiting the disclosure of call detail over the phone unless the customer provides a password established in a manner consistent with 47 C.F.R. § 64.2010(e)
3. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. § 64.2010 (c) and (e).
4. Established procedures that notify customers immediately when there has been a change to the account as contemplated by 47 C.F.R. §64.2010 (f).

AT&T Inc. CPNI Certification
Calendar Year 2010

Date: February 22, 2011

1. I, William Hague, Executive Vice President – International, Alliances and Integration for AT&T Mobility and Consumer Markets, (“Responsible Business Unit”)] hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts and third parties upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2010, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC’s rules, 47 C.F.R. § 64.2001 et. seq. (the “FCC’s CPNI rules”).

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: William W. Hague

William Hague Executive Vice President – International, Alliances and Integration

**AT&T MOBILITY AND CONSUMER MARKETS – Retail Sales and Service
EXPLANATORY STATEMENT OF CPNI COMPLIANCE 2010**

In accordance with Section 64.2009(e) of the Federal Communication Commission's ("FCC") CPNI rules, AT&T Mobility and Consumer Markets – International, Alliances and Integration ["My Organization"], has adopted procedures that are intended to ensure compliance with 47 C.F.R. Part 64 Subpart U-Customer Proprietary Network Information for certain markets acquired by AT&T Mobility from Verizon Wireless. This statement summarizes and explains these procedures and explains how these procedures were designed (or adopted from Alltel Wireless) to ensure compliance with the CPNI rules.

My Organization is responsible for the integration of the properties AT&T purchased from Verizon Wireless on June 22, 2010. Specifically, AT&T acquired certain Alltel Wireless, Rural Cellular Corporation ("Unicel"), and Verizon Wireless CDMA assets from Verizon Wireless. Under terms of the agreement, AT&T acquired wireless properties, including licenses, network assets and 1.6 million current subscribers in seventy-nine (79) service areas, primarily in rural areas across eighteen (18) states. Verizon Wireless was required to divest these properties as part of the regulatory approvals granted for its purchase of Alltel in 2009. The states represented are: Alabama, Arizona, California, Colorado, Iowa, Kansas, Michigan, Minnesota, Montana, Nebraska, Nevada, New Mexico, North Dakota, South Dakota, Tennessee, Utah, Virginia and Wyoming.

Since this acquisition closed, AT&T has been working to deploy its GSM technology over the acquired Alltel, Unicel, and Verizon CDMA networks and to migrate the acquired customers. Prior to migrating customers and launching the AT&T brand in

the acquired markets, AT&T has operated the CDMA properties with AT&T employees under the Alltel, Unice!, and Verizon brand. In addition to the AT&T employees, AT&T has received certain support services from Verizon Wireless, pursuant to a transition services agreement.

My Certification of CPNI Compliance addresses the pre-migration CDMA properties operated by AT&T under the Alltel, Unice!, and Verizon brands. My certification is based on two specific areas: (1) compliance mechanisms followed by AT&T employees operating CDMA properties under the Alltel, Unice!, and Verizon brands; and (2) a certification from Verizon Wireless certifying those companies' compliance with CPNI obligations in the provision of services to AT&T under the Transition Service Agreement.

For the AT&T employees covered by my Certification, the described processes and procedures have either been (i) developed and implemented in My Organization, or (ii) developed by other organizations or other companies, in which case My Organization operates in compliance with such applicable processes and procedures.

In addition to AT&T employees in My Organization, Verizon Wireless provided certain support services to AT&T in conjunction with AT&T's purchase of the assets from Verizon Wireless and I have relied on the attestation of Verizon Wireless regarding compliance by those companies with CPNI regulations for services provided to AT&T.

A. Customer CPNI Approvals. My Organization has:

1. AT&T acquired wireless properties, including licenses, network assets and 1.6 million current subscribers from Verizon Wireless. During the time AT&T ran the CDMA markets under their existing brands, AT&T followed the legacy sales methods

and procedures. The Verizon/Alltel Management Trust filed a certification with the Commission on September 28, 2010, wherein they stated that such sales methods and procedures were in compliance with the Commission's CPNI rules.

B. Training and Disciplinary Policy.

1. My Organization requires all employees to review AT&T's Code of Business conduct which includes general information regarding protection of customer records and system access policies. New employees are required to complete this training within thirty ("30") days of their start date. AT&T maintains a record of completion of review of the Code of Business conduct. AT&T further requires all employees who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training and provides relevant employees information on CPNI and other privacy related issues through less formal education methods such as employee communications. See 47 C.F.R. § 64.2009(b).

2. AT&T maintains a policy requiring compliance with the CPNI rules and advises in the CPNI training and in the Code of Business Conduct that any failure by any personnel to comply with the CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the nature and severity of the non-compliance. See 47 C.F.R. § 64.2009(b).

C. Sales and Marketing Campaigns. All Sales and Marketing Campaigns in which My Organization engages were executed by the Buyer's Support Organization pursuant to the Transition Services Agreement.

D. Security and Authentication. My Organization has:

1. During the time AT&T ran the CDMA markets under their existing brands, AT&T followed the legacy sales methods and procedures. The Verizon/Alltel Management Trust filed a certification with the Commission on September 28, 2010, wherein they stated that such sales methods and procedures were in compliance with the Commission's CPNI rules.
2. Processes and controls to log and process customer-initiated CPNI complaints and breaches (as "breach" is defined in 47 CFR 64.2011(e)) for investigation and resolution and for complaint tracking and breach reporting purposes were handled by the Buyer's Support Organization pursuant to the Transition Services Agreement.

Date: Feb 22, 2011

William W. Hague
William Hague

Calendar Year 2010 AT&T Inc. CPNI Certification

Date: 1/14/2011

1. I, Denise Iverson, Director – Network Operations, as an officer of BellSouth Long Distance, LLC d/b/a/ AT&T Long Distance ("Responsible Business Unit") hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2010, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: Denise Iverson

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2010
OF Denise Iverson, Director of Operations, BellSouth Long Distance, LLC d/b/a/
AT&T Long Distance**

In accordance with Section 64.2009(e) of the FCC's rules, BellSouth Long Distance, LLC ("BSLD") provides the following explanation of how its operating procedures are adequate to ensure compliance with the CPNI rules for its customers.

BSLD has no sales channels of its own for retail services, but sells such services through the sales channels of affiliated AT&T companies, each of which is charged with ensuring compliance with the requirements set forth in *Subpart U - Customer Proprietary Network Information* of the FCC Rules, 47 CFR §§ 64.2001 *et seq.* (the "FCC's CPNI rules"). BSLD relies on the certifications of the affiliated AT&T companies to affirm that, as of the date of this certificate, there are operating procedures in place that are adequate to ensure compliance with the FCC's CPNI rules.

Prior to any solicitation for CPNI approval, BSLD provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI, consistent with the notice rules set forth in 47 CFR §§ 64.2007 and 64.2008.

Attachment 2

**AT&T Inc. CPNI Certification
Calendar Year 2010**Date: 2/7/11

1. I, Frank Jules, Executive Vice President - Global Enterprise Solutions ("Responsible Business Unit") hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.
2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2010, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").
3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: 

Attachment 2

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2010
OF Frank Jules, Executive Vice President - Global Enterprise Solutions**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the Global Enterprise Solutions (my organization) ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures.

A.. Customer CPNI Approvals. To the extent applicable my organization has:

1. Established and distributed methods and procedures (M&Ps) whereby personnel were not to disclose or permit access to customer's CPNI for "out of category" services without customer approval or unless such disclosure or access was permitted under FCC rules and personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer's CPNI must remain in effect until revocation or limitation of such

Attachment 2

approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).

2. Established and distributed M&Ps whereby personnel were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).

3. Established and distributed M&Ps whereby personnel were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the customer granted "opt in approval" as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).

4. Established and distributed M&Ps whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, to notify the customer of the customer's right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, established and distributed M&Ps whereby personnel were required to make a record of customer's consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).

5. Established and distributed M&Ps whereby personnel were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer's right to restrict the use of, disclosure of, and access to that customer's CPNI. 47 C.F.R. §64.2008(b) and (c).

7. Established and distributed M&Ps whereby personnel were required, prior to any oral solicitation for limited, one time use of a customer's CPNI, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).

8. Established M&Ps or implemented systems to clearly establish the status of a customer's CPNI approval prior to the use of CPNI. See 47 C.F.R. §64.2009(a).

Attachment 2

B. Training and Discipline: My organization:

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, my organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner and all AT&T employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009 (b).
2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

C. CPNI Complaints and Breaches: To the extent applicable my organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

D. Security and Authentication. To the extent applicable my organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. § 64.2010(a).

Attachment 2

2. Established methods and procedures prohibiting the disclosure of call detail over the phone unless the customer provides a password established in a manner consistent with 47 C.F.R. § 64.2010(e)
3. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. § 64.2010 (c) and (e).
4. Established procedures that notify customers immediately when there has been a change to the account as contemplated by 47 C.F.R. §64.2010 (f).

**AT&T Inc. CPNI Certification
Calendar Year 2010**

Date: 1-24-2011

1. I, Kathryn Morrissey, Executive Vice President, Wholesale and GEM Solutions hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.
2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2010, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").
3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.



Signature: _____

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2010
OF Kathryn Morrissey, Executive Vice President, Wholesale and GEM Solutions**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the Wholesale and GEM Solutions Organization (WGS) that ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures.

A.. Customer CPNI Approvals. To the extent applicable my organization has or my support organization has:

1. Established procedures whereby personnel were not to disclose or permit access to customer's CPNI for "out of category" services without customer approval or unless such disclosure or access was permitted under FCC rules and personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer's CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).
2. Established procedures whereby personnel were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).
3. Established procedures whereby personnel were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1)

the customer granted “opt in approval” as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).

4. Established procedures whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer’s CPNI, to notify the customer of the customer’s right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, established procedures whereby personnel were required to make a record of customer’s consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).

5. Maintained an IVR and toll free number with voice mail whereby customers, at no additional cost, could avail themselves of an “opt-out” method. The IVR and voice mail were available 24 hours a day, seven days a week. See 47 C.F.R. §64.2008(d)(3)(v).

6. Established procedures whereby personnel were required, prior to any oral solicitation for limited, one time use of a customer’s CPNI for duration of the call, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).

7. Use established systems to clearly maintain the status of a customer’s CPNI approval prior to the use of CPNI. See 47 C.F.R. §64.2009(a).

B. Training and Discipline: My organization:

1. Requires all personnel within my organization who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009 (b).

2. WGS maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and

including termination of employment, depending on the severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

C. CPNI Complaints and Breaches: To the extent applicable my organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

For 2010, WGS had no documented complaints.

D. Security and Authentication. I have knowledge that the respective Care teams which support my organization have:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. § 64.2010(a).
2. Established methods and procedures prohibiting the disclosure of call detail over the phone unless the customer provides a password established in a manner consistent with 47 C.F.R. § 64.2010(e)
3. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. § 64.2010 (c) and (e).
4. Established procedures that notify customers immediately when there has been a change to the account as contemplated by C.F.R. §64.2010 (f)

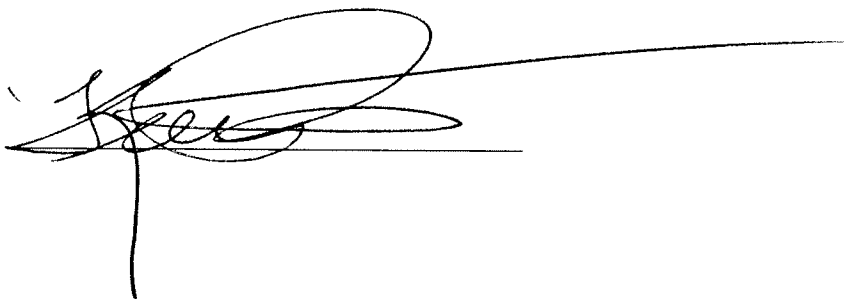
Calendar Year 2010 AT&T Inc. CPNI Certification

Date:

1/24/11

1. I, Kevin Peters, Chief Marketing Officer, AT&T Business Solutions – Business Marketing, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied, hereby certify that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including review of all necessary supporting documentation developed by persons with subject matter expertise.
2. I certify that as of December 31, 2010, the Business Marketing Organization for which I am accountable, has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. §64.2001 et. seq. (the "FCC's CPNI rules").
3. I further certify that I am not aware of any known instances of noncompliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature:

A handwritten signature in black ink, appearing to read "Kevin Peters", is written over a horizontal line. The signature is stylized with a large loop and a long horizontal stroke extending to the right.

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2010
OF KEVIN PETERS, CHIEF MARKETING OFFICER, AT&T BUSINESS
SOLUTIONS – BUSINESS MARKETING**

In accordance with the requirements of 47 C.F.R. § 64.2009(3) of the FCC rules regarding CPNI, AT&T Business Marketing provides the following explanation of how its operating procedures are adequate to ensure compliance with the CPNI rules.

1. AT&T Business Marketing has processes in place to protect the access to Customer Proprietary Network Information as defined in 47 C.F.R. § 64.2001 et seq.
2. AT&T Business Marketing has processes and procedures in place designed to obtain customer approval to use, disclose or permit access to CPNI if AT&T intends to use CPNI in circumstances where such approval would be required. As part of the CPNI solicitation process, AT&T advises customers of their right to restrict use of, disclosure of, and access to CPNI, and provides the customer the requisite notice information required by 47 C.F.R. § 64.2005 and 64.2008.
3. AT&T Business Marketing has established methods and procedures designed to implement customer notifications to comply with the FCC rules to include storage and archiving of notifications for a minimum of one year required by 47 C.F.R. § 64.2008.
4. AT&T Business Marketing has provided adequate training to employees on when they are and are not authorized to use CPNI. AT&T has established a strict Privacy Policy that explains CPNI in detail, and employees adhere to the AT&T Code of Conduct which describes employees' obligation to protect customer information. See 47 C.F.R. §64.2009.
5. AT&T Business Marketing has processes in place and steps to enhance supervisory review processes that are related to carrier compliance, including supervisory approval of any proposed outbound marketing request for customer approval, and for the maintenance of records related to carrier compliance. 47 C.F.R. § 64.2009 (d).
6. AT&T Business Marketing has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T Business Marketing discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

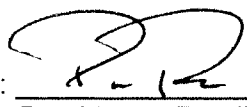
AT&T Inc. CPNI Certification
Calendar Year 2010

Date: 1/12/11

1. I, Paul Roth, President – Retail Sales and Service for AT&T Mobility and Consumer Markets, ("Responsible Business Unit") hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2010, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: 
Paul Roth, President – Retail Sales and Service

AT&T MOBILITY AND CONSUMER MARKETS – Retail Sales and Service EXPLANATORY STATEMENT OF CPNI COMPLIANCE 2010

In accordance with Section 64.2009(e) of the Federal Communication Commission’s (“FCC”) CPNI rules, AT&T Mobility and Consumer Markets – Retail Sales and Service [“My Organization”], has adopted procedures that are intended to ensure compliance with 47 C.F.R. Part 64 Subpart U-Customer Proprietary Network Information. This statement summarizes and explains these procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in My Organization, or (ii) developed by other organizations, in which case My Organization operates in compliance with such applicable processes and procedures. My Organization’s processes also include processes designed to detect and correct potential deficiencies in the implementation and maintenance of its CPNI operating procedures.

A. Customer CPNI Approvals. My Organization has:

1. Established processes and controls intended to prohibit the use of, disclosure of, or access to CPNI to market service offerings that are not within a category of service to which the customer already subscribes from AT&T or its affiliates (“out-of-category services”) or any other purpose requiring customer approval, unless: (a) such access, use, or disclosure is permitted under the FCC’s rules without customer approval. See 47 C.F.R. § 64.2005; or (b) the customer granted limited, one-time use “opt-in approval” as defined in 47 C.F.R. § 64.2003(k) for the duration of a call or the duration of a visit. See 47 C.F.R. § 64.2007(b) and 47 C.F.R. § 64.2008(f).
2. Established processes and controls to maintain a record, for at least one year, of limited, one-time use approval to use a customer’s CPNI to market “out-of-category” services for the duration of a call or the duration of a visit. See 47 C.F.R. § 64.2007(a)(3).
3. Established processes and controls requiring oral notification of the customer’s right to restrict use of, disclosure of, and access to that customer’s CPNI consistent with 47 C.F.R. § 64.2008(a)(1) and to provide the customer the requisite notice information

required by 47 C.F.R. § 64.2008(c) prior to any solicitation for limited, one-time use approval to use CPNI to market “out of category” services. See 47 C.F.R. § 64.2008(f).

B. Training and Disciplinary Policy.

1. My Organization requires all employees to review and certify to AT&T’s Code of Business conduct which includes general information regarding protection of customer records and system access policies. New employees are required to complete this training within 30 days of their start date. AT&T further requires all employees who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training and provides relevant employees information on CPNI and other privacy related issues through less formal education methods such as employee communications. See 47 C.F.R. § 64.2009(b).

2. AT&T maintains a policy requiring compliance with the CPNI rules and advises in the CPNI training and in the Code of Business Conduct that any failure by any personnel to comply with the CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the nature and severity of the non-compliance. See 47 C.F.R. § 64.2009(b).

C. Sales and Marketing Campaigns. All Sales and Marketing Campaigns in which My Organization engages are governed by processes and procedures whereby such activities are reviewed and receive the requisite supervisory approval and in connection with which the requisite records are maintained for a one year period.

D. Security and Authentication. My Organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. § 64.2010(a).

2. Established methods and procedures prohibiting the disclosure of call detail over the phone.

3. Established a policy that prohibits access to or disclosure of CPNI except to customers and authorized users who first provide a valid photo ID matching their name on the account. See 47 C.F.R. § 64.2010(d).
4. Established processes and controls to authenticate a customer or authorized user without the use of readily available biographical information or account information in order to establish a password that grants access to CPNI. See 47 CFR 64.2010(e).
5. Employed AT&T's established processes and controls to log and process customer-initiated CPNI complaints and breaches (as "breach" is defined in 47 CFR 64.2011(e)) for investigation and resolution and for complaint tracking and breach reporting purposes. See 47 CFR § 64.2011

AT&T Inc. CPNI Certification
Calendar Year 2010

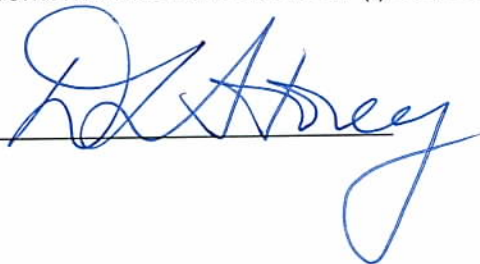
Date: _____

1. I, Debbie Storey, Senior Vice President Consumer Centers Support, AT&T Centers Sales and Service, AT&T Mobility and Consumer Markets, hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2010, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: _____

A handwritten signature in blue ink, appearing to read "Debbie Storey", written over a horizontal line.

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2010
OF DEBBIE STOREY, SENIOR VICE PRESIDENT – CENTERS SUPPORT, AT&T
CONSUMER CENTERS SALES AND SERVICE, AT&T MOBILITY AND CONSUMER
MARKETS**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the AT&T Mobility and Consumer Markets – Centers Sales and Service organization (my organization) ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures.

A.. Customer CPNI Approvals. To the extent applicable my organization has:

1. Established and distributed methods and procedures (M&Ps) whereby personnel were not to disclose or permit access to customer's CPNI for "out of category" services without customer approval or unless such disclosure or access was permitted under FCC rules and personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer's CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).
2. Established and distributed M&Ps whereby personnel were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).
3. Established and distributed M&Ps whereby personnel were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the customer granted "opt in approval" as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).
4. Established and distributed M&Ps whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, to notify the customer of the customer's right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, established and distributed M&Ps whereby personnel were required to make a record of customer's consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).

5. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer's right to restrict the use of, disclosure of, and access to that customer's CPNI. 47 C.F.R. §64.2008(b) and (c).
6. Maintained an IVR and toll free number with voice mail whereby customers, at no additional cost, could avail themselves of an "opt-out" method. The IVR and voice mail were available 24 hours a day, seven days a week. See 47 C.F.R. §64.2008(d)(3)(v).
7. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for limited, one time use of a customer's CPNI for duration of the call, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).
8. Established M&Ps or implemented systems to clearly establish the status of a customer's CPNI approval prior to the use of CPNI. See 47 C.F.R. §64.2009(a).
9. Established and distributed M&Ps whereby AT&T employees, agents and representatives were not permitted to discuss customer call detail information over the telephone unless the customer provides the call detail information to be discussed and duplicate bills containing call detail information can be mailed to the customer's address of record that is at least thirty days old. See 47 C.F.R. §64.2010(e).

B. Training and Discipline: My organization:

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, my organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner and all AT&T employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009 (b).

2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

C. CPNI Complaints and Breaches: To the extent applicable my organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

D. Security and Authentication. To the extent applicable my organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. § 64.2010(a).
2. Established methods and procedures prohibiting the disclosure of call detail over the phone. 47 C.F.R. § 64.2010(e)
3. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. § 64.2010 (c) and (e).
4. Established procedures that notify customers immediately when there has been a change to the account as contemplated by 47 C.F.R. §64.2010 (f).

AT&T Inc. CPNI Certification
Calendar Year 2010

Date: January 25, 2011

1. I, Carol Tacker, SVP and Chief Compliance Officer, AT&T Services, Inc., Finance-Compliance, hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2010, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: _____



**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2010
OF CAROL TACKER, SVP AND CHIEF COMPLIANCE OFFICER, AT&T SERVICES,
INC., FINANCE-COMPLIANCE**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the Finance-Asset Protection organization of AT&T Services, Inc., ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures.

CPNI Breach Investigations / Documentation / Reporting Process:

1. AT&T established M&Ps and training for Asset Protection personnel to manage the reporting of CPNI breaches to law enforcement to ensure

compliance with the requirements set forth in 47 C.F.R. §64.2011 (a), (b) (1)-(3). Asset Protection has been designated as the sole AT&T organization with the authorization and responsibility to report breaches to law enforcement.

2. AT&T has developed M&Ps to ensure compliance with 47 C.F.R. §64.2011 (d). Asset Protection maintains records of discovered breaches to include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstance of the breach. These records are retained for a minimum of two (2) years.

3. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures.

2010 AT&T Inc. CPNI Certification

Date: 1/24/11

1. I, Michael J. Viola, Senior Vice President – Finance ("Responsible Business Unit") hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.
2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2010, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").
3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: 

2010 EXPLANATORY STATEMENT OF CPNI COMPLIANCE

In accordance with the requirements of 47 C.F.R. §64.2009(e) of the FCC rules regarding CPNI, AT&T provides the following explanation of how its operating procedures are adequate to ensure compliance with the CPNI rules for the AT&T Finance, Credit & Collections organization:

The Credit & Collections organization has established methods and procedures to ensure compliance with the rules around approval for the use, disclosure or access to CPNI and required notification for marketing to customers to the extent personnel in my organization makes sales referrals on inbound calls and for which the sales transaction is completed by other work groups. (§64.2005(a), (b), §64.2007(a), §64.2008(a),(f))

To the extent Credit & Collections personnel market to customers on inbound calls, adequate training for the associated methods and procedures has been provided to such personnel to ensure an understanding of when they are and are not authorized to use CPNI as well as the status of a customer's CPNI approval prior to the use of CPNI for marketing purposes. (§64.2009(a), (b))

AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. Employees in my organization are required to adhere to the policies as well as the AT&T Code of Business Conduct. The Code of Business Conduct describes employees' obligation to protect customer information.

For personnel in Credit & Collections with access to CPNI, methods and procedures are in place to ensure adequate safeguards for the disclosure of CPNI. Procedures include specific authentication requirements prior to disclosing CPNI, including the use of passwords and back up authentication methods for lost or forgotten passwords as applicable. Additionally, procedures are in place to provide the required notifications for account changes as required by the rules. (§64.2010 (a), (b), (e), (f))

Methods and procedures are in place to support the requirements for tracking customer complaints regarding the unauthorized release of CPNI. (§64.2009 (e), §64.2011(a))

ATTACHMENT A
AT&T CY10 Annual CPNI Certifications

AT&T Entities

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

AT&T Entity	FCC Registration Number
Abraham Divestiture Company LLC	0018787986
Acadiana Cellular General Partnership	0001837814
ACC Corp.	0014553119
ACC National Telecom Corp	0013443718
Alascom, Inc.	0001572676
Alton CellTel Co. Partnership	0003767290
AT&T Communications of California, Inc.	0003301702
AT&T Communications of Delaware, LLC.	0012838504
AT&T Communications of Hawaii, Inc.	0014532501
AT&T Communications of Illinois, Inc.	0003301793
AT&T Communications of Indiana, GP	0012838421
AT&T Communications of Maryland, LLC	0012838512
AT&T Communications of Michigan, Inc.	0003301876
AT&T Communications of Nevada, Inc.	0003301959
AT&T Communications of New York, Inc.	0012838462
AT&T Communications of NJ, LP	0012838520
AT&T Communications of Ohio, Inc.	0003301736
AT&T Communications of Pennsylvania, LLC	0012838538
AT&T Communications of Texas, Inc.	0016657918
AT&T Communications of the Midwest, Inc.	0003301751
AT&T Communications of the Mountain States, Inc.	0003301892
AT&T Communications of the Pacific Northwest, Inc.	0003301710
AT&T Communications of the South Central States, LLC	0012838561
AT&T Communications of the Southern States, LLC	0012838553
AT&T Communications of the Southwest, Inc.	0003301918
AT&T Communications of Virginia, LLC	0012838546
AT&T Communications of Washington, D.C., LLC	0012838488
AT&T Communications of West Virginia, Inc.	0003301785
AT&T Communications of Wisconsin, LP	0012838454
AT&T Corp	0005937974
AT&T Mobility LLC	0004979233
AT&T Mobility of Galveston LLC	0016658122
AT&T Mobility Spectrum LLC	0014980726
AT&T Mobility Wireless Operations Holdings Inc.	0020078887
AT&T of Puerto Rico, Inc.	0001731462
AT&T of the Virgin Islands, Inc.	0003464344
AWACS, Inc.	0010852523
Bauce Communications of Beaumont, Inc.	0001562040
Bellingham Cellular Partnership	0004312559
BellSouth International, LLC	0005858907
BellSouth Long Distance d/b/a AT&T Long Distance	0003733318

AT&T Entities

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

AT&T Entity	FCC Registration Number
BellSouth Mobile Data, Inc.	0013935085
BellSouth Telecommunications, Inc.	0005795679
BizTel, Inc.	0003998978
Bloomington Cellular Telephone Company	0001573328
Bradenton Cellular Partnership	0004312591
Bremerton Cellular Telephone Company	0004312609
Cagal Cellular Communications Corporation	0001803246
Caprock Newco LLC	0019919117
CCPR of the Virgin Islands, Inc.	0004499034
Centennial Beauregard Cellular LLC	0012921946
Centennial Caldwell Cellular LLC	0008816779
Centennial Cellular Tri-State Operating Partnership	0012926176
Centennial Claiborne Cellular Corp	0012926184
Centennial Communications Corp.	0009631136
Centennial Hammond Cellular LLC	0012926341
Centennial Lafayette Communications LLC	0012926424
Centennial Michiana License Company LLC	0003296480
Centennial Michigan RSA 6 Cellular Corp.	0010310688
Centennial Michigan RSA 7 Cellular Corp.	0008816944
Centennial Morehouse Celllular LLC	0003574142
Centennial Puerto Rico License Corp.	0003572864
Centennial Puerto Rico Operations Corp.	0003572849
Centennial Randolph Cellular LLC	0008816795
Centennial Southeast License Company LLC	0003296472
Centennial USVI Operations Copr.	0007467384
Champaign CellTelco	0001460537
Chattanooga MSA Limited Partnership	0001842723
Cincinnati SMSA Limited Partnership	0004160842
Cingular Wireless of Texas RSA #11 Limited Partnership	0003294048
Cingular Wireless of Texas RSA #16 Limited Partnership	0003294006
Decatur RSA Limited Partnership	0004588455
Dobson Cellular Systems of Alaska, LLC	0015568579
Edge Wireless, LLC	0003800679
Elkhart Cellular Telephone Company	0012927109
Elkhart Metronet, Inc.	0003594991
Florida RSA No. 2B (Indian River) Limited Partnership	0001837566
Georgia RSA No. 3 Limited Partnership	0001836998
Hood River Cellular Telephone Company, Inc.	0001572924
Houma-Thibodaux Cellular Partnership	0004547931
Illinois Bell Telephone Company	0002860856
Indiana Bell Telephone Company, Inc.	0002904654
Lafayette Cellular Telephone Company	0001545771
Lafayette MSA Limited Partnership	0001682509
Las Cruces Cellular Telephone Company	0003299963

AT&T Entities

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

AT&T Entity	FCC Registration Number
Louisiana RSA No. 7 Cellular General Partnership	0001837798
Louisiana RSA No. 8 Limited Partnership	0001837830
Lubbock SMSA Limited Partnership	0001650787
Madison SMSA Limited Partnership	0002842060
McAllen-Edinburg-Mission SMSA Limited Partnership	0001658467
Medford Cellular Telephone Company, Inc.	0004312772
Mega Comm LLC	0012927208
Melbourne Cellular Telephone Company	0004312799
Michiana Metronet, Inc.	0003595147
Michigan Bell Telephone Company	0002776771
Milwaukee SMSA Limited Partnership	0002846293
Missouri RSA 11/12 Limited Partnership	0001658418
Missouri RSA 8 Limited Partnership	0001658442
Missouri RSA 9B1 Limited Partnership	0001658426
Nevada Bell Telephone Company	0001552173
New Alton CellTelCo, LLC	0020315925
New Bellingham Cellular LLC	0020315883
New Bremerton Cellular Telephone Company LLC	0020315966
New Champaign CellTelco LLC	0020315933
New Cingular Wireless PCS, LLC	0003291192
New Provo Cellular Telephone Company LLC	0020315909
New Salem Cellular Telephone Company LLC	0020315719
New Visalia Cellular Telephone Company LLC	0020315958
Northeastern Georgia RSA Limited Partnership	0001837152
Ocala Cellular Telephone Co., Inc.	0001573492
Oklahoma City SMSA Limited Partnership	0001658392
Oklahoma Independent RSA 7 Partnership	0010698884
Oklahoma RSA 3 Limited Partnership	0001658376
Oklahoma RSA 9 Limited Partnership	0001658368
Olympia Cellular Telephone Company, Inc.	0004312807
Orlando SMSA Limited Partnership	0001843036
Pacific Bell Telephone Company	0001551530
Peach Acquisitions LLC	0019872852
Pine Bluff Cellular, Inc.	0001722271
Provo Cellular Telephone Company	0004312815
Reno Cellular Telephone Company	0004312864
Salem Cellular Telephone Company	0004312880
Santa Barbara Cellular Systems Ltd.	0004312898
Sarasota Cellular Telephone Company	0004312906
SBC Internet Services, Inc. d/b/a AT&T Internet Services	0012536033
SBC Long Distance, LLC	0003763497
SLO Newco LLC	0019959303
SNET America, Inc.	0003737707
SNET Diversified Group, Inc.	0007586423

AT&T Entities

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

AT&T Entity	FCC Registration Number
South Bend Metronet Inc.	0008816910
Southwestern Bell Telephone Company	0016627473
St. Cloud Cellular Telephone Company, Inc.	0001572742
TC Systems, Inc.	0012833513
TCG America, Inc.	0003476611
TCG Chicago	0014531990
TCG Colorado	0014532022
TCG Connecticut	0014532048
TCG Dallas	0014532089
TCG Detroit	0014532113
TCG Illinois	0014532162
TCG Indianapolis	0014532204
TCG Joint Venture Holdings Inc. dba TCG Oregon	0014532238
TCG Kansas City, Inc.	0014532261
TCG Los Angeles, Inc.	0014532287
TCG Maryland	0014532303
TCG Midsouth, Inc.	0014532345
TCG Milwaukee, Inc.	0014532386
TCG Minnesota, Inc.	0014532410
TCG New Jersey, Inc.	0017516725
TCG of the Carolinas, Inc.	0014532428
TCG Ohio	0014532451
TCG Omaha	0014532469
TCG Oregon	0014535009
TCG Phoenix	0014532550
TCG Pittsburgh	0014532576
TCG Rhode Island	0014532592
TCG San Diego	0014532642
TCG San Francisco	0014533004
TCG Seattle	0014533053
TCG South Florida	0014533079
TCG St. Louis	0014533087
TCG Utah	0014533111
TCG Virginia, Inc.	0014533145
TeleCorp Communications, LLC	0011499910
Teleport Communications – Washington DC, Inc.	0014533368
Teleport Communications Atlanta, Inc.	0014533178
Teleport Communications Houston, Inc.	0014533277
Teleport Communications New York	0014533301
Texas RSA 18 Limited Partnership	0001666072
Texas RSA 19 Limited Partnership	0001666056
Texas RSA 20B1 Limited Partnership	0001665058
Texas RSA 6 Limited Partnership	0001665991
Texas RSA 7B1 Limited Partnership	0001666007

AT&T Entities

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

AT&T Entity	FCC Registration Number
Texas RSA 9B1 Limited Partnership	0001666023
Texas RSA No. 2 Limited Partnership	0004550547
The Ohio Bell Telephone Company	0002946986
The Southern New England Telephone Company	0005049150
Topeka SMSA Limited Partnership	0001658632
VDI Newco LLC	0019746627
Visalia Cellular Telephone Company	0004312971
Wisconsin Bell, Inc.	0002716561

AT&T Inc.
Attachment to Calendar Year 2010 CPNI Certificates

**Summaries of Customer Complaints and
Actions Taken Against Data Brokers**

Summary of Customer Complaints

As required by 47 C.F.R. §64.2009(e), following is a summary of customer complaints concerning the unauthorized release of Customer Proprietary Network Information (CPNI) received by AT&T Inc. from January 1, 2010 to December 31, 2010:

CPNI Complaint Category	Number of Customer Complaints 2010
Complaints of improper access to CPNI by an AT&T employee or an AT&T agent	675
Complaints of improper disclosure of CPNI to an unauthorized third party	51
Complaints of improper access to online CPNI by an unauthorized third party	46
Total	772

Summary of Actions Taken Against Data Brokers

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.